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IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE: William S. Hudic, : Bankruptcy No. 19-22920-TPA

Debtor.

: Chapter 13

Nissan Motor Acceptance Corporation, : Document No.:

Movant, : Related Document No.:

:

William S. Hudic, and :

v.

Ronda J. Winnecour, Trustee

Respondent. :

RESPONSE TO UNITED STATES' MOTION TO DISMISS CASE

And now comes William S. Hudic (hereinafter "Debtor"), by and through his counsel Brian C. Thompson, Esquire and Thompson Law Group, P.C., and files this Response to Affidavit of Default of Stipulated Order Resolving the Motion for Relief from the Automatic Stay representing as follows:

- 1. Admitted.
- 2. Admitted in part. By way of further response, Debtor has made significant payments to the Chapter 13 Trustee in the amount of \$6,000.00 on December 2, 2021, and \$6,000.00 on January 5, 2022.
- 3. Paragraph 3 refers to a writing to which no response is required.
- 4. Denied. By way of further response, refer to paragraph 2.
- 5. Admitted. By way of further response, Chapter 13 Trustee made two disbursements totaling \$1,538.05 on December 23, 2021.
- 6. Denied. By way of further response, refer to paragraphs 2 and 5.

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7. Paragraph 7 is a prayer for relief to which no response is required.

Wherefore, Debtor respectfully requests that the Court enter an Order denying Movant's Affidavit of Default of Stipulated Order Resolving the Motion for Relief from the Automatic Stay, and for such other relief the Court deems equitable and just.

Respectfully submitted,

Dated: January 12, 2022 /s/Brian C. Thompson, Esquire

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